

REMARKS

The specification has been amended. Claims 1, 15, and 17 have been amended. No new matter has been introduced with these amendments, which are supported in the specification as originally filed. Claims 1 - 18 remain in the application.

I. Rejection under 35 U.S.C. §102

Page 2 of the Office Action dated September 27, 2004 (hereinafter, "the Office Action") states that Claims 1, 15, and 17 are rejected under 35 U.S.C. §102(b) as being anticipated by Barkley et al. (U.S. 6,202,066). Pages 2 - 3 of the Office Action further state that Claims 2 - 14, 16, and 18 are also rejected under 35 U.S.C. §102(b) as being anticipated by Barkley. This rejection is respectfully traversed.

Referring first to independent Claims 1, 15, and 17, Applicants respectfully submit that the Office Action fails to make out a *prima facie* case of anticipation as to these claims. The first limitation of these claims specifies "...identifying one or more groups of permitted actions on selected resources" (emphasis added). The second limitation specifies "... assigning a name to each identified group" (*i.e.*, assigning a name to each group of permitted actions) and the final limitation specifies "... associating subjects with each assigned name" (*i.e.*, associating subjects, such as users or groups of users, with each named group of permitted actions).

Barkley uses a different approach. In particular, Barkley teaches groups (*i.e.*, roles) that are comprised of users, not groups of permitted actions. (See, for example, col. 5, line 1, "role ...

assigned to users".) Furthermore, in contrast to Applicants' technique of controlling access based on groups of permitted actions, Barkley teaches that access is controlled with regard to collections of objects. (See, for example, col. 4, lines 29 - 30, "introducing an object-based access control method", emphasis added, and lines 33 - 35, "an object-based access control method may be employed to provide convenient access to objects", emphasis added.)

See also col. 5, lines 5 - 11, where Barkley teaches that "... those [users or groups] designated as members of a first role [are] to be given a first level of access or permissions to a first set of files or objects, while those [users or groups] designated to a second role are granted a different second level of access to the same set of files." Suppose, for example, that Barkley's "first role" is comprised of users A, B, and C, while the second role is comprised of users X, Y, and Z. The "set of files or objects" may be, for example, Barkley's "accounts" files. The "first level of access or permissions" may be, for example, read-only access for users A, B, and C in the first role, and read/write access for users X, Y, and Z in the second role. As can be seen by referring to Barkley's text (such as the text in col. 5, lines 5 - 11), Barkley teaches assigning names to the roles, but (in contrast to the first and second limitations of their independent claims), Applicants find no discussion in Barkley that groups of permitted actions are identified and assigned a name. See also col. 5, lines 9 - 13, where Barkley's Object Access Type, or "OAT", is defined in terms of access to sets/groups of objects. The text of those lines states that "An OAT is then created associating the first role [*i.e.*, a first named collection of users/groups] with the first level of permissions, and the second role similarly with the second [level of permissions].".

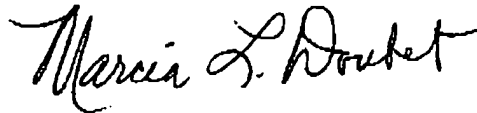
According to Applicants' understanding of Barkley's teachings, Barkley's disclosed approach corresponds to the "role-privilege" model which was discussed at length in Applicants' specification. See, for example, the discussion of Applicants' Fig. 2, which begins on p. 12 of Applicants' specification. Applicants' specification teaches that the role-privilege model uses a privilege attribute associated with users and user groups, and roles that can be mapped to one or more subjects (*i.e.*, users, user-groups, etc.). See p. 13, lines 3 - 5. As stated in Applicants' specification, in a role-privilege model, "A number of roles are defined, and user groups are associated with these roles.". See p. 15, lines 13 - 14. This "role-privilege" model is in contrast to Applicants' disclosed "role-permissions" model. See, for example, the discussion of Applicants' Fig. 4, where an example role-permissions model is presented.

In summary, Applicants respectfully submit that Barkley fails to teach assigning a name to an identified group of permitted actions on selected resources, and then associating subjects with that named group. Barkley therefore fails to teach the limitations of Applicants' independent Claims 1, 15, and 17, and these claims are therefore deemed patentable over Barkley. Dependent Claims 2 - 14, 16, and 18 are therefore deemed allowable over Barkley by virtue of the novelty of the independent claims. The Examiner is therefore respectfully requested to withdraw the §102 rejection.

II. Conclusion

Applicants respectfully request reconsideration of the pending rejected claims, withdrawal of all presently outstanding rejections, and allowance of all claims at an early date.

Respectfully submitted,



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